

REMARKS

Claims 1-7 and 9 are pending in the application. Claims 1-7 and 9 are rejected. Claims 1 and 9 are amended herein to clarify what is claimed. The claims as amended include the same subject matter as previously claimed. No new subject matter is added or claimed. All rejections are respectfully traversed.

In an Advisory Action dated November 17, 2003, the Examiner refused to enter an amendment in response to the final rejection filed by the Applicants on October 23, 2003, stating "the newly added limitations in claim 1 raise new issues that require further consideration and search." The Amendment to claim 1 is re-submitted herein using only the exact words from original dependent claim 9. The limitation is now EXACTLY the same. A limitation from an originally filed dependent claim which is incorporated into an independent claim can NEVER be considered new matter. The Applicants therefore request the Examiner enter and consider this amendment.

Claims 1-7 and 9 are rejected under 35 U.S.C. 103(a) as being unpatentable over Abali, et al. (U.S. Patent 6,317,114 -Abali) in view of Kerr, et al, (U.S. Patent 4,916,536 - Kerr).

Sensors react to some stimulus that must exist or be occurring, such as movement. The claimed predictive controller anticipates movement that has not yet occurred.

The invention both adjusts an image in response to sensed movement and **anticipates** the movement. The dictionary definition of anticipate is: 1. To feel or realize beforehand; foresee, 2. To look forward to, 3. To act in advance so as to prevent;

forestall, 4. To foresee and fulfill in advance. The claimed predictive controller anticipates movement that a display device will be subjected to. Abali reacts to sensed movement only.

According to the Examiner's own remarks, Abali describes "a method of compensating for motion of an image on a display device having a display screen, includes sensing a movement of the display device, and compensating for the movement of the display device." The Examiner states that it is clear from the above passage that Abali predicts movement. However, movement that is sensed by a sensor has already occurred, otherwise, Abali's sensor would have no reading, and could never compensate for anything. Abali must sense actual movement. Sensing movement as it occurs is not anticipating movement as claimed, and can never make anticipating movement obvious.

Further, the Examiner states that the claimed predictive controller is met by the graphics driver of Abali. However, Abali teaches that his graphics driver takes as input a digital displacement signal from his sensors, displacement which has already occurred, and "feeds the digital signal to the video processing circuitry 62 of the computer which will shift the image by necessary amounts," see col. 6, lines 14-25. Here again, Abali describes reacting to movement that already exists, not anticipating movement as claimed.

Regarding claims 2-5, Abali therefore fails to describe, teach, suggest or show anticipating movement of a display device wherein the display screen is a CRT, wherein the display signals are deflection signals for the cathode ray tube, wherein the display screen is digital, and wherein the display signals are

address signals for a frame buffer of the digital screen. Abali never anticipates movement.

The Examiner does not apply Kerr to teach anticipating movement or a predictive controller as claimed, and the Applicants agree that Kerr does not describe this.

Claimed is each compensation circuit including a first and second integrator to convert acceleration to position and at least one band-pass filter, and a low frequency cut-off of the band pass filter is less than one half cycle per second, a high frequency cut-off is less than a refresh rate of the display screen, and each compensation circuit includes a gain control circuit.

The Examiner states that the Applicants cannot show non-obviousness by attacking the references individually where the rejection is based on a combination of the references. However, it should be understood that the Applicants are respectfully traversing the proposed combination itself.

The art that applies to input devices such as microphones does not apply to output devices as speakers. This is self-evident. Similarly, the art that applies to a camera, another input device, cannot be applied to an output device such as a projector. The operations of these devices are entirely opposite. This is well known to those of ordinary skill in the arts.

Kerr's range finder is an input device. Claimed is an output device.

Kerr describes vibration compensation for the a sensor - an input device, the range finder 10 in Figure 1, not his output or display device, the television monitor 20 in Figure 1.

Abali cannot be combined with Kerr. Abali stabilizes an **output signal**, while Kerr stabilizes an **input signal**. There is no evidence that Kerr's input signal is equivalent in any way to Abali's output signal. That would defy the laws of physics. The Examiner asserts that Abali provide a method and apparatus for improving the conventional recording system. But, Kerr compensates for movement of radiation reflected from a field of view, see column 2, lines 5-8, "*An image is produced by measuring the intensity of the reflected radiation at numerous points in the field of view.*" Abali compensates for movement of a **displayed** image (output device). The two references cannot be combined.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any remaining issues and further to expedite passage of the application to issue, if any further comments, questions or suggestions arise in connection with the application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this

paper, including extension of time fees, to Deposit Account 50-0749 and please credit any excess fees to such deposit account.

Respectfully Submitted,  
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